

# **Exhibit**

# **2**

Page 1

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE MIDDLE DISTRICT OF ALABAMA  
3 SOUTHERN DIVISION  
4  
5 CURLY YOUNG, )  
6 Plaintiff, )  
7 vs. ) CIVIL ACTION:  
8 HONEYWELL TECHNOLOGY 1:02-CV-00563-SRW  
9 SOLUTIONS, et al )  
10 Defendants. )  
11  
12  
13 STIPULATIONS:  
14 IT IS STIPULATED AND AGREED by  
15 and between the parties through their  
16 respective counsel, that the deposition  
17 of KENNETH A. ERICKSON may be taken  
18 before Winters O. Hope, Alabama CSR #104,  
19 Commissioner and Notary Public, State of  
20 Alabama at Large, at the offices of Mr.  
21 Joe W. Adams, Attorney at Law, 1278  
22 Andrews Avenue, Ozark, Alabama, 36360, on  
23 the 27th day of March, 2007.

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1 IT IS FURTHER STIPULATED AND  
2 AGREED that the signature to and the  
3 reading of the deposition by the witness  
4 is waived, the deposition to have the  
5 same force and effect as if full  
6 compliance had been had with all laws and  
7 rules of Court relating to the taking of  
8 depositions.  
9 IT IS FURTHER STIPULATED AND  
10 AGREED that it shall not be necessary for  
11 any objections to be made by counsel as  
12 to any questions, except as to form or  
13 leading questions, and that counsel for  
14 the parties may make objections and  
15 assign grounds at the time of trial, or  
16 at the time said deposition is offered in  
17 evidence or prior thereto.  
18 IT IS STIPULATED AND AGREED that  
19 this deposition is taken after issuance  
20 of formal notice.  
21  
22  
23

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1 INDEX:  
2 EXAMINATION BY: PAGE:  
3 MR. BENNITT 445  
4 MS. REISS 45 - 57  
5  
6  
7 - - - - -  
8 BEFORE:  
9 Winters O. Hope, Commissioner.  
10 APPEARANCES:  
11 Mr. Jeffrey W. Bennett,  
12 Attorney at Law, 4898 Valleydale Road,  
13 Birmingham, Alabama, 35242, appearing for  
14 the Plaintiff.  
15 Ms. Sandra B. Reiss, Attorney at  
16 Law, of the firm of Ogletree, Deakins,  
17 Nash, Smoak & Stewart, P.C., One Federal  
18 Place, Suite 1000, 1819 5th Avenue North,  
19 Birmingham, Alabama, 35203, appearing for  
20 the Defendants.  
21 Also in appearance:  
22 Mr. Curly Young, Plaintiff.  
23 Mr. Jerry L. Temple, Defendant.

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1 I, Winters O. Hope, Alabama CSR  
2 104, and Notary Public for the State of  
3 Alabama at Large, acting as Commissioner,  
4 certify that on this date, as provided by  
5 The Federal Rules of Civil Procedure and  
6 the foregoing stipulation by counsel,  
7 there came before me at 11:41 a.m.,  
8 Central Daylight Time, on March 27, 2007,  
9 KENNETH A. ERICKSON, witness in the above  
10 cause for oral examination, whereupon the  
11 following was had and done:  
12  
13  
14 KENNETH A. ERICKSON:  
15 having been duly sworn, was  
16 examined and testified as follows:  
17  
18 EXAMINATION BY MR. BENNITT:  
19 Q State your name, please.  
20 A Kenneth A. Erickson.  
21 Q And your place of employment?  
22 A Honeywell, Fort Rucker, Alabama.  
23 Q Your title?

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1 A Project Manager.  
2 Q Your duties?  
3 A I am the Project Manager. I  
4 supervise all the sections that are out  
5 there on the range.  
6 Q And what were your duties at the  
7 time of Mr. Young's termination?  
8 A Project Manager.  
9 Q Same duties?  
10 A Same duties.  
11 Q State the race of Plaintiff at  
12 the time of his termination.  
13 A Sir, you mean, state the race of  
14 Curly Young?  
15 A Uh-huh. (Indicated yes.)  
16 A Curly Young was black.  
17 Q Was Plaintiff qualified for his  
18 or her job at the time of the decision?  
19 A He was qualified for the Junior  
20 Range Tech position. That's correct.  
21 Q Tell me the name, race of the  
22 person who took his job.  
23 A Chris Hines is white. He -- he

Page 6

1 was placed in that position because he  
2 had to -- we had to fill that slot at the  
3 time.  
4 Q And what date did he take over  
5 this job?  
6 A The day after Mr. Young's  
7 termination papers.  
8 Q Did he apply for the job?  
9 A No, sir. He just filled the  
10 position at that time because we had no  
11 one. We hadn't even advertised the  
12 position at the time. He actually did  
13 both jobs. He had to do his job on that  
14 Gunnery Range, plus this job, at that  
15 time.  
16 Q Did he have help?  
17 A Yes, he did.  
18 Q How many helpers?  
19 MS. REISS: At what time?  
20 Q I'm sorry. When he took over and  
21 started performing Mr. Young's job.  
22 A He did not have a helper at that  
23 time because the RCS Operator that we had

Page 7

1 was mobilized to Iraq.  
 2 Q Did you give him helpers later?  
 3 A Yes, sir. The Range Maintenance  
 4 Section would come in and help close out  
 5 all the contracts. We have contract  
 6 requirements that we have to meet each  
 7 quarter.  
 8 Q How many helpers did he get?  
 9 A He had -- on the range side would  
 10 be Mr. Temple, Calvin Flowers -- I'm not  
 11 sure if Gregory Borders -- no, Gregory  
 12 Borders was not -- and Rodney Sellers.  
 13 Q What was the designation of Mr.  
 14 Young's range? What was its  
 15 nomenclature? What was it called?  
 16 A He was called a Junior Range  
 17 Tech.  
 18 Q But did his range itself have a  
 19 designation on it?  
 20 MS. REISS: At what time?  
 21 Q At the time of his termination.  
 22 A He was in charge of maintenance  
 23 on the small arms ranges. There was more

Page 8

1 than one.  
 2 Q And so my question is, is that  
 3 when Mr. Hines took over his job on the  
 4 small arms ranges, did he have helpers?  
 5 A Yes, he did.  
 6 Q And those were the ones you  
 7 named?  
 8 A Yes.  
 9 Q What was the designation of Mr.  
 10 Hines' former range called?  
 11 A Mr. Hines was a Junior Range Tech  
 12 --  
 13 Q Yes, sir.  
 14 A -- the same classification as Mr.  
 15 Young.  
 16 Q And what was the name -- the  
 17 nomenclature? What was the name of his  
 18 range?  
 19 A He was on the Gunnery Range at  
 20 the time.  
 21 Q Who took Mr. Hines' place?  
 22 MS. REISS: I object to the form.  
 23 I don't understand. When? What are you

Page 9

1 talking about?  
 2 A After we advertised --  
 3 MS. REISS: Let him clarify that  
 4 question, please.  
 5 A Okay.  
 6 Q Okay. Mr. Hines took Mr. Young's  
 7 place, and then his -- he worked both  
 8 jobs for a while.  
 9 A Correct.  
 10 Q And so my question is, is that at  
 11 some point in time you all got somebody  
 12 to take over Mr. Hines' former position.  
 13 Right?  
 14 A Correct.  
 15 Q And who was that, and what was  
 16 his race?  
 17 A I believe it was Calvin Flowers,  
 18 and he is black.  
 19 Q Okay. And when did he take over  
 20 Mr. Hines' spot? Approximately.  
 21 A Approximately six weeks for the  
 22 hiring process to go into effect.  
 23 Q Okay. Is Mr. Flowers still doing

Page 10

1 Mr. Hines' former job?  
 2 A That is correct.  
 3 Q Is Mr. Hines, at the present  
 4 time, still performing Mr. Young's former  
 5 job?  
 6 A That is correct.  
 7 Q Did you have input in the  
 8 decision to terminate Mr. Young?  
 9 A Yes, sir. I had input. I  
 10 recommended the -- I can forward the  
 11 recommendations to Corporate  
 12 Headquarters. They have the final  
 13 decision-making authority.  
 14 Q Okay. Can you state exactly, and  
 15 precisely, the reasons for the  
 16 termination decision that you made?  
 17 A The decision I made was based on  
 18 three write-ups that Mr. --  
 19 MS. REISS: I'm going to object,  
 20 to the extent that that mischaracterizes  
 21 his testimony. He did not make the  
 22 decision.  
 23 MR. BENNITT: I'm sorry. Input.

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1 MS. REISS: He said he  
 2 recommended it.  
 3 Q (By Mr. Bennitt) The same  
 4 question, only, when you made the  
 5 recommendation.  
 6 A I made the recommendation because  
 7 of three write-ups that were given to  
 8 him; one of which was given to him from a  
 9 Thomas Lavar, who was black, who was my  
 10 Quality Control Inspector, for not having  
 11 a Preventative Maintenance and Checks and  
 12 Services sheet on his vehicle. The  
 13 second one was because of he left a  
 14 vehicle in disarray -- and that was  
 15 discovered by Thomas Lavar, also -- and  
 16 then he had a gas blower full of gas  
 17 inside the cab of the truck. The last  
 18 one was accountability: He did not  
 19 account for supply procedures for the  
 20 mannequins in the supply room that he was  
 21 in charge of. And he also was trained on  
 22 this, so that he would keep up with  
 23 accountability on the supplies. And that

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1 was the three reasons.  
 2 Q Was the company fined by the Army  
 3 for any of these disciplinarys?  
 4 A No, sir. They were not, because  
 5 Honeywell discovered these actions before  
 6 the Government Inspector caught them.  
 7 Q Okay. Did Honeywell lose any  
 8 money because of these three  
 9 disciplinarys?  
 10 A No, sir, they did not.  
 11 Q Do you know if Mr. Temple had any  
 12 input with you in the decision-making  
 13 process?  
 14 A Mr. Temple had no input on the  
 15 decision-making process for the  
 16 termination of Mr. Young.  
 17 Q Did he say anything to you? Did  
 18 he give his recommendation to you?  
 19 A No, sir, he did not.  
 20 Q Did you make the decision to  
 21 promote Robert Hadley in that  
 22 Electrician's position?  
 23 A No, sir, I did not. Robert

Page 13

1 Hadley was hired into that position that  
 2 he's in currently. I did not promote him  
 3 into that position; we hired him into  
 4 that position.  
 5 Q And who hired him?  
 6 A I recommended the hire. I put it  
 7 to Corporate Headquarters.  
 8 Q Was Mr. Young given an  
 9 opportunity to try to get that position?  
 10 A Yes, sir. Mr. Young was given an  
 11 opportunity, even though he did not meet  
 12 the minimum requirements for the  
 13 position. My -- my intent in that was in  
 14 case we couldn't find an individual that  
 15 had the minimum requirements for that  
 16 position, I was going to go down to the  
 17 government and ask for a waiver for that  
 18 requirement that required him to have an  
 19 electronics degree.  
 20 Q Did -- did Mr. Young score higher  
 21 on the testing than Mr. Hadley, for that  
 22 position?  
 23 A Yes, sir. He scored higher on

Page 14

1 the testing; however, he did not score  
 2 higher on the interview.  
 3 Q Is the test an objective test,  
 4 asking objective questions?  
 5 A No, sir. It's a skills test.  
 6 Q The interview - is it an  
 7 objective or a subjective interview?  
 8 A Please clarify.  
 9 Q Can you give me the three top  
 10 reasons, if you can -- because I'm kind  
 11 of limiting this question -- of how Mr.  
 12 Hadley scored better on the interview  
 13 than Mr. Young?  
 14 A Mr. Hadley came in and he had --  
 15 one of the requirements was background  
 16 education requirements, which he had.  
 17 The second issue was how much experience  
 18 he had. Mr. Hadley had six years of  
 19 electronics and electricity experience  
 20 background in his hiring process.  
 21 Q Anything else?  
 22 A No, sir.  
 23 Q Could you have gotten a waiver?

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1 Or how hard is it to get a waiver?  
 2 A Well, sir, I tried to get a  
 3 waiver for Calvin Flowers for a CDL  
 4 license. And I went down and talked to  
 5 the Contracting Officer's representative,  
 6 and they denied the waiver for the CDL  
 7 license. I'm assuming I would have tried  
 8 to go down and get one, if I had to come  
 9 up with that solution. I'm not too sure  
 10 the government would have approved it.  
 11 Q Would this have given Mr. Young a  
 12 raise, had he been given the job?  
 13 A I believe it would have given him  
 14 a very minimal raise.  
 15 Q Of about how much, in your best  
 16 judgement?  
 17 A I can't -- I could not. I would  
 18 have to look it up. I wouldn't want to  
 19 quote you an exact figure, but --  
 20 Q I don't need an exact figure.  
 21 Just give me a judgement.  
 22 MS. REISS: I don't want him to  
 23 guess. If he doesn't know the amount, he

Page 16

1 shouldn't guess, to go on the record.  
 2 Q Are there any more reasons that  
 3 you gave the job to Mr. Hadley, over Mr.  
 4 Young, than what you told me?  
 5 A No, sir.  
 6 Q Did Plaintiff make race  
 7 complaints to you?  
 8 A No, sir. He made complaints to  
 9 me about the hiring process for some  
 10 individuals. And I informed Mr. Young  
 11 that my hiring process, if someone  
 12 doesn't get selected, then I call them in  
 13 my office and explain to them why.  
 14 Q Did that have to do with the  
 15 Calvin Flowers?  
 16 A Yes, sir.  
 17 Q Did he make any -- any complaints  
 18 involving race? And let's don't talk  
 19 about Calvin Flowers.  
 20 A He made a complaint to me about  
 21 an off-color joke that a Pat Little had  
 22 told on the range.  
 23 Q When was that?

Page 17

1 A I can't recall the exact date.  
 2 But I did address the issue with Pat  
 3 Little. I made Pat Little go over and  
 4 apologize to Mr. Young; and then I asked  
 5 Mr. Young, if he wanted to pursue this  
 6 further, give it to me in writing, then I  
 7 would more than definitely pursue that,  
 8 in writing, because Honeywell does not  
 9 tolerate that kind of thing.  
 10 Q Did he make any complaints to  
 11 you, say, within a three month time  
 12 period of his termination, about what he  
 13 considered to be racial attitude,  
 14 atmosphere, going on at Honeywell?  
 15 A No, sir, he did not.  
 16 Q The same question, not limited to  
 17 three months. Just at any time.  
 18 A No, sir.  
 19 Q Do you know if Chris Hines is  
 20 related to Jerry Temple, from any source?  
 21 A Sir, the only thing I know about  
 22 this situation is that I confronted it  
 23 after the deposition, and I asked Mr.

Page 18

1 Temple if he knew anything about the  
 2 relationship. And he mentioned something  
 3 to me about being a fourth cousin, and  
 4 they were not engaged. So Jerry Temple  
 5 is not related to Chris Hines.  
 6 Q Do you know whether or not they  
 7 are friends?  
 8 A No, sir, I do not.  
 9 Q Are you familiar with Chris  
 10 Hines' work performance --  
 11 A Yes, sir.  
 12 Q -- with Honeywell?  
 13 A Yes, sir, I am. Chris Hines is  
 14 an outstanding worker. He performs his  
 15 job every day. Every time I've ever come  
 16 up on Mr. Chris Hines, he was always  
 17 working. I never had to question his  
 18 ethic.  
 19 Q Has he ever been disciplined?  
 20 A Yes, sir, he has.  
 21 Q And how many times?  
 22 A Two times.  
 23 Q Tell me about the first time.

Page 19

1 A The first time, he shorted out a  
 2 system in a bunker, and it -- he just --  
 3 it was a safety violation.  
 4 Q What was the safety violation?  
 5 A The safety violation was, he  
 6 didn't lock-out and tag-out properly at  
 7 the bunker.  
 8 Q What kind of violation was that,  
 9 in relationship to whether it's serious,  
 10 minor?  
 11 A It was a serious violation. It  
 12 was his first attempt at the violation.  
 13 But after further investigation, we  
 14 realized that the training that we were  
 15 giving for the lock-out, tag-out  
 16 procedures for the bunkers was not  
 17 accurate; that not all the bunkers were  
 18 wired exactly the same. So the training  
 19 that Chris Hines had received was not on  
 20 that particular bunker. And then, since  
 21 then, we have put signs in these bunkers  
 22 to show the individuals the proper  
 23 procedures, because the bunkers aren't

Page 20

1 exactly alike.  
 2 Q Did the company lose money over  
 3 this incident from the Army?  
 4 A No. The company did not lose any  
 5 money at all. There was a \$778 charge  
 6 for that piece to have to be repaired,  
 7 but that was back-charged to the  
 8 government.  
 9 Q Was it fined by the Army? Was  
 10 the company fined by the Army for this  
 11 incident?  
 12 A The company was not fined. But  
 13 it was mentioned in the award fee, and we  
 14 lost percentages on the award fee. That  
 15 is correct.  
 16 Q How much did you lose? About?  
 17 Best judgement?  
 18 A About -- about 2%.  
 19 Q How much is that?  
 20 A Approximately about \$1,200.  
 21 Q If -- if Mr. Hines was not at  
 22 fault, why was the company fined by the  
 23 Army?

Page 21

1 A The company was fined on the  
 2 award fee at the time of the incident.  
 3 But after the investigation, which took  
 4 about three to four months to discover  
 5 this, we realized that there was an  
 6 error, and the government understood what  
 7 had happened: that he wasn't trained  
 8 properly on the -- on the lock-out, tag-out  
 9 procedures, because they were  
 10 different. But it was beyond -- we get  
 11 our award fees quarterly. And once that  
 12 award fee is given, it cannot be redone.  
 13 Q Tell me exactly what he did in  
 14 his attempt to lock-out and tag-out, in  
 15 this incident where he got hurt.  
 16 A I'm not exactly sure. I  
 17 understood that he had put a screwdriver  
 18 in a high-voltage area. That's all I  
 19 know. I'm not familiar with it. I'm not  
 20 an expert on lock-out, tag-out of the  
 21 bunkers.  
 22 Q When you say the word "error," do  
 23 you mean that he made an error of

Page 22

1 judgement, or did he make an error of  
 2 failure to follow procedure?  
 3 A He did not make an error of  
 4 judgement. In my opinion, he made an  
 5 error of following procedures, because he  
 6 wasn't properly trained on the lock-out,  
 7 tag-out for that particular bunker.  
 8 Q Did he attempt to make -- to  
 9 perform a lock-out, tag-out?  
 10 A Yes, sir, he did.  
 11 Q What did he do?  
 12 A He locked out -- he tagged and  
 13 locked out the wrong box.  
 14 Q And that's in the report? That's  
 15 in the investigation?  
 16 A Yes, sir. It was in the  
 17 investigation.  
 18 Q Well, did he receive a discipline  
 19 for this?  
 20 A Yes, sir, he did.  
 21 Q Why did he receive a discipline,  
 22 if it was the company's fault, in that he  
 23 wasn't trained properly?

Page 23

1 A He received a discipline, again,  
 2 because at the time he had the incident,  
 3 we assumed that he knew what he was  
 4 supposed to be doing, so we automatically  
 5 had written him up for that procedure.  
 6 Q He was put on probation. Right?  
 7 A Yes, sir, he was.  
 8 Q And for a year. Right?  
 9 A Yes, sir.  
 10 Q Well, was he taken off probation  
 11 when you realized that it was really  
 12 your company's fault, and not his?  
 13 A No, sir. We just annotated that,  
 14 and we used it as a safety tool to teach  
 15 others. But, no, it was not removed from  
 16 his records.  
 17 Q How long had Mr. Hines been  
 18 employed when this first one occurred?  
 19 Approximately. In your best judgement.  
 20 A Approximately two years.  
 21 Q Had he ever worked a bunker like  
 22 this before?  
 23 A No, sir. He was training on the

Page 24

1 bunkers. He had started on the small  
 2 arms ranges.  
 3 Q Who had worked these bunkers  
 4 before?  
 5 A Mr. Young and Mr. Temple.  
 6 Q So Mr. Young knew how to lock-out, tag-out  
 7 these boxes. Correct?  
 8 A Yes, sir. I'm assuming he did.  
 9 Q Was Mr. Young required to teach  
 10 Mr. Hines?  
 11 A Sir, I don't know who taught Mr.  
 12 Hines.  
 13 Q It would be either Mr. Temple or  
 14 Mr. Young, though. Right?  
 15 A That is correct.  
 16 Q Okay. So if he wasn't trained,  
 17 somebody dropped the ball there.  
 18 Correct? That would be either Mr. Young  
 19 or Mr. Temple.  
 20 A Sir, I believe it would have been  
 21 Mr. Temple.  
 22 Q Well, was he written up for that?  
 23 A No, sir, he was not.



Page 25

1 Q Why not?

2 A I probably should have written

3 him up for it.

4 Q All right. Let's go to the

5 second incident with Mr. Hines. When did

6 that occur?

7 A It occurred shortly thereafter.

8 I don't know the exact date. I would

9 have to look at the write-up to see that,

10 and I don't have it in front of me.

11 Q All right. What happened?

12 A However, there was a pipe -- that

13 he was taking a pipe out on the range,

14 him and another individual, and they had

15 the pipe sticking out of the back end of

16 the truck. They were crossing Highway

17 27, and the pipe was sticking out of the

18 back of the truck, and the Government

19 Quality Control Inspector spotted the

20 truck going with the pipe hanging out the

21 back, and he informed me that they were

22 doing it without putting a flag on the

23 back.

Page 26

1 Q Was that considered to be, for

2 lack of a better term, a serious offense?

3 A minor offense?

4 A I consider it a minor offense.

5 Q Mr. Hines and Mr. Young, do they

6 perform nearly identically the same job?

7 A They both have to be trained into

8 doing all aspects of a Junior Range

9 Technician. That's their job

10 description. Both of them have the same

11 job description.

12 Q And are they under the same

13 supervisor?

14 A That is correct.

15 Q And under the same plant rules?

16 A That is correct.

17 Q Are they cross-trained to do each

18 other's job?

19 A Yes, sir. We had just started

20 cross-training.

21 Q So, then, in every aspect, every

22 relevant aspect of their jobs, they

23 perform nearly identical work.

Page 27

1 A They were tasked to perform the

2 same identical jobs. That is correct.

3 Q Talking about the three

4 disciplinaries that you had discussed

5 earlier, I shall call it P.M. -- it's the

6 truck thing, about maintaining your

7 truck. What is it called? P.M. -- the

8 first disciplinary you gave him.

9 MS. REISS: The form?

10 A Okay, it's Preventative

11 Maintenance and Check Services.

12 Q P.M.A.C.

13 A No. P.M.C.S.

14 Q I mean, P.M.C.S. Sorry. The

15 second one I'm going to call "Dirty

16 Truck."

17 A Yes, sir.

18 Q And then, the third one I'm going

19 to call "Accountability."

20 A Yes, sir.

21 Q How would you rate P.M.C.S.? As

22 a serious, minor or average offense?

23 A The government sees that

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1 Preventative Maintenance and Checks and

2 Services is a very serious event, because

3 we have to maintain government equipment,

4 and they relegate it to the elevation of

5 serious.

6 Q What about the Dirty Truck?

7 MS. REISS: I'll object to the

8 characterization. It's more than a dirty

9 truck.

10 A Yes, sir.

11 MS. REISS: Go ahead and answer.

12 Q I'm going to -- will you give me

13 the name for Number 2 in your own words?

14 A The -- it was Preventative

15 Maintenance Checks and Services, but it

16 was also an environmental and safety

17 hazard; because not only was the truck

18 filthy, and scattered with paint cans and

19 everything inside the truck, it had a gas

20 blower inside the cab, full of fuel.

21 Q Okay.

22 A And the Quality Control

23 Supervisor came to me and said, "This is

Page 29

1 extremely dangerous. I opened the cab of

2 the truck and the fumes were just blowing

3 out." And actually --

4 Q That was Mr. Lavar?

5 A Yes.

6 Q Okay. So how is Number 2 rated?

7 A Very serious.

8 Q And Number 3: Accountability.

9 How is that rated?

10 A That's very serious, because in

11 our contract we are required to maintain

12 accountability of all government

13 equipment. And when the government comes

14 up, they are required to do a 10% check

15 each month. We perform 10% checks each

16 month in order to keep ahead and make

17 sure we don't. We actually had a

18 Greenbelt Certification Process, of which

19 Mr. Young was involved in, and he

20 understood that the accountability

21 process was extremely important to the

22 government. And we believe in voice of

23 the government, because it's our

Page 30

1 customer. And when we got into that

2 situation, we had started out the Six

3 Sigma Team. Greenbelt Certified people

4 had agreed that the card had to be

5 processed immediately when that item is

6 taken out of that supply room.

7 Q So let's talk about -- I've seen

8 the photographs of the truck at the last

9 deposition, and that's what you're

10 talking about when you say disciplinary

11 Number 2 was a safety and environmental,

12 as well as a P.M.S.C. violation.

13 A P.M.C.S., sir.

14 Q Yeah. Acronyms are --

15 A I understand. It's for

16 Preventative Maintenance and Check and

17 Service.

18 Q I want to discuss -- first of

19 all, is there a "Wall of Shame"?

20 A No, sir.

21 Q Something called a "Wall of

22 Shame"?

23 A People call it the "Wall of